COMMENTS OF AT&T
CONCERNING
THE SBC/AMERITECH OSS PLAN OF RECORD FOR ILLINOIS
January 21, 2000

AT&T Communications of Illinois, Inc. ("AT&T") submits its Comments in response to the Plan Of Record (hereafter also "Plan" or "POR") issued by SBC/Ameritech on January 7, 2000.[1] For the reasons set forth below, the Commission should reject the Plan as submitted by SBC/Ameritech and require it to be revised and completed before proceeding to the OSS collaborative.

Background and Introduction

The Illinois Merger Conditions provide that "Joint Applicants shall implement a *comprehensive plan* for improving the OSS systems and interfaces available to CLECs in Illinois." Id. (Emphasis supplied.) The OSS Condition, which was initially proposed by SBC/Ameritech as a merger commitment and ultimately adopted by the Commission, with certain modifications, calls for a three-phase process. Phase 1 of that process is the development of a Plan of Record which is to consist of

> an overall assessment of SBC's and Ameritech's existing OSS interfaces, business processes and rules, hardware and data capabilities, and security provisions, and differences, and the companies' plan for developing and deploying application-to-application interfaces and graphical user interfaces for OSS, as well as integrating their OSS processes. Id.

[1] These Comments are submitted pursuant to Paragraph 29 of the Merger Conditions adopted by the Commission in its Order of September 23, 1999 in SBC Communications Inc., SBC Delaware Inc., Ameritech Corporation, and Illinois Bell Telephone Company, d/b/a Ameritech Illinois, Joint Application for approval of the reorgznization of Illinois Bell, etc., Docket No. 98-0555 (the "Merger Order") pp. 243-264.

The POR is to be "accepted or rejected" by the Commission following an expedited CLEC comment cycle and Staff recommendation. The OSS Condition further specifies that in Phase 2 "SBC/Ameritech shall work collaboratively with ICC Staff and Illinois CLECs, in a series of workshops, to obtain written agreement on OSS interfaces, enhances, and business requirements identified in the Plan of Record." Phase 2 is scheduled to run for three months. At its conclusion Phase 3, which is the implementation and testing phase, begins.

In this framework, the Plan of Record serves as the basis for collaborative discussions between SBC/Ameritech, ICC Staff and CLECs. Further, as it is developed in the collaborative process, the POR will describe the improvements to OSS systems and interfaces to be implemented by SBC/Ameritech. The issue for the Commission at this point, therefore, is whether the POR as produced by SBC/Ameritech is adequate to serve as the basis for the collaborative process and should be accepted, or whether it has deficiencies necessitating further work on their part before the parties and Staff proceed to the collaborative.

For the reasons set forth below in these Comments, the POR is seriously incomplete and deficient, and it does not provide an adequate basis for going forward into the collaborative. As described in Section I, the POR identifies various changes to Ameritech's OSS for pre-ordering and ordering functions effective April 1, 2000, but in describing its "Future Method of Operation" it fails to provide the most important

(and basic) information about the nature of those changes.[2] In the absence of such information, however, CLECs are in no position to prepare for and participate in the Illinois collaborative process, much less to design and build preordering and ordering systems of their own in order to go into business. Moreover, as discussed in Section II, SBC/Ameritech have failed in their plan to address essential business rules and processes, including operations directly associated with and affected by the planned OSS changes. These omissions as well render the Plan seriously incomplete.[3] Consequently, the Commission should reject the POR as published and require SBC/Ameritech to correct it, as described below.

I. The OSS Plan Of Record Omits Elements That Are Essential To An Understanding And Assessment Of The Planned Systems Changes And Thus Are A Necessary Predicate To The Collaborative Process

As noted above, the Commission in Merger Condition 29 adopted a framework for OSS improvements that proceeds on the basis of a Plan of Record produced in the first instance by SBC/Ameritech. The POR is the document that is to be taken to the collaborative process with Staff and CLECs and is to be the foundation for discussing and ultimately assessing the adequacy of SBC's proposed system changes in Illinois. If the POR is incomplete in material respects, or if it is otherwise flawed or unacceptable, it cannot serve its intended purpose, and the remainder of the process will be adversely

[2] Indeed, in important respects SBC/Ameritech has explicitly withheld information, saying it will be made available only when required in connection with the merger conditions ordered by the FCC. POR, p. 28. SBC/Ameritech in fact sought rehearing on this point, requesting the Commission to "synchronize" the OSS collaborative timelines, including that for filing a Plan of Record, with the timetable under the FCC merger conditions. See Joint Applicants' Application For Rehearing, filed October 25, 1999. The Commission denied that request.

[3] For convenience, a "checklist" of the more significant omissions and deficiencies discussed in these comments is included as Attachment A.

affected. Moreover, as a practical matter, significant shortcomings or gaps in the POR cannot be remedied during the collaborative process itself. Paragraph 29 provides that if the CLECs and SBC/Ameritech have not reached agreement after *one month* of collaborative discussions, a list of issues is to be submitted to the Commission for arbitration. There will not be time for SBC/Ameritech to fill in major gaps and uncertainties in the Plan once the collaborative begins. The POR must be sufficiently complete that the parties can analyze it and prepare for collaborative discussions to attempt to arrive at a document that can truly be said to be a "comprehensive plan for improving the OSS systems and interfaces available to CLECs in Illinois." The POR as published falls seriously short of that standard.[4]

A. Pre-Ordering

As described in the "Present Methods of Operation" discussion (POR, pp. 4-5), Ameritech has used "Electronic Data Interchange" ("EDI") as the basis for its pre-order interface. Ameritech began the work to create this interface in 1996, before the industry standards-setting body, ATIS,[5] had adopted standards for pre-ordering. Subsequent generations of the industry standards, known as the "Local Service Order Guidelines" or

[4] The discussion which follows focuses on the EDI application-to-application interfaces, since they are the interfaces on which AT&T expects to rely most heavily with Ameritech and the other RBOCs.

[5] Alliance for Telecommunications Industry Solutions is the organization that publishes industry standards, guidelines and operating procedures used by interexchange and local carriers to support interoperability of the carriers. Its key committees whose work establishes the standards for pre-ordering and ordering are the Ordering and Billing Forum ("OBF") and the Telecommunications Industry Forum ("TCIF"), and the standards are known as the Local Service Ordering Guides ("LSOG") and the Electronic Local Mechanized Specifications ("ELMS").

"LSOG," have come and gone. LSOG Version 3 standards were adopted by the industry in May, 1998, and LSOG 4 conventions became the industry standard in June of 1999.[6]

As to SBC/Ameritech's plans for the pre-ordering system, the POR refers only to "the introduction of *an updated version* of the current EDI application to application interface" to occur in March 2001. This version of the interface will "provide additional functionality" and will "update the interface to *a more recently available version* of OBF and TCIF standards." POR, p. 27. Remarkably, however, SBC does not disclose *what* version of the standards it is planning to move to in March 2001. In fact, according to SBC/Ameritech's timeline, the "Release Announcement" for the up-dated pre-ordering application-to-application interface is not until May of 2000, which is likely *after* the Phase 2 collaborative under the schedule established in the Merger Order. It seems reasonable to ask just what it is that SBC/Ameritech expect to "collaborate" on with respect to the pre-order interface?

This omission is not a trivial matter. An enormous amount of effort has been devoted to the industry forums that have developed these standards, and a CLEC for its part must know what version of the Local Service Ordering Guidelines the ILEC is

[6] The industry standards serve three purposes: (1) they define what transactions types can be exchanged and what those transactions mean (i.e., the business function they are to accomplish); (2) they specify what data elements are necessary to accomplish the transactions; and (3) they establish what the characteristics of the data elements should be (e.g., number of characters in a field, whether the field is to contain alphabetic or numeric characters, and whether the field is required, optional or conditional). When an RBOC's specifications are said to be "compliant with the standard," it means that all three characteristics have been achieved.

implementing, and the extent of the ILEC's compliance with that standard.[7] SBC/Ameritech fully understand the importance of this fact, and the omission of this information cannot have been inadvertent.

If SBC/Ameritech is planning to move the Ameritech pre-ordering interface to LSOG 4 and be fully compliant with those standards, it should state that fact in the Plan of Record prior to the commencement of the collaboratives. If it intends to define and develop its interface with known deviations from the LSOG 4 standards, it should so state and disclose with specificity the extent to which the interface will conform to and depart from the industry standards. If SBC/Ameritech has no plan as to which industry standard it intends to implement for pre-ordering in the Ameritech region, it is important to know that from the outset as well. The collaborative process should consist of discussions of SBC/Ameritech's OSS plans and whether they are adequate to support CLECs' needs and foster local competition; it should not be consumed by CLECs and Staff trying to ferret out the basics of *what those plans are*.

Similarly, the POR contains high-level descriptions of changes Ameritech intends to make by April of 2000 in pre-ordering functions. POR, pp. 27-29. However, it fails to provide the most elementary information on the manner in which these changes are to be

[7] The level of compliance with LSOG standards tells the CLEC community important information about the functions the ILEC will be making available. For example, Customer Service Record ("CSR") inquiries that are serviced with a "fielded" response (i.e., each piece of data is provided in a pre-defined location and format within the response) are known as "parsed" or fielded Customer Service Records. Ameritech's retail systems use fielded CSRs to generate service orders for changes to products, services and features of its end users. Access to parsed CSRs is equally important to CLECs. Full compliance with the LSOG 4 standard would include parsing of CSRs; less than full compliance with LSOG 4 might or might not, and LSOG 3 compliance would not. In any event, that is something that should be a part of the Plan of Record, not deferred until after the collaborative as proposed by SBC/Ameritech.

implemented, and absent such information CLECs are unable to discern how such functional changes could be implemented and used. This problem is magnified by the fact that Ameritech has for so long maintained its pre-ordering interface with such little regard for prevailing industry standards. For example, the POR states that the "Network Channel (NC) and Network Channel Interface (NCI) Codes Inquiry function will be first made available as part of the functionality addition to the current interface in April 2000." This function, depending upon the manner in which it is designed and implemented, could allow CLECs to query the Ameritech databases to determine the Network Channel and Network Channel Interface[8] codes assigned to any loop on the basis of the customer's telephone number or circuit number. This is critical information that must be provided on CLEC requests for loop migrations or other loop provisioning activity. If Ameritech had communicated its design of the function, CLECs would know if it will be beneficial or not.[9] In the case of other RBOCs it might be possible to predict the way in which these functions likely would operate, because the pre-ordering functions

[8] These codes reflect the composition of the loop; for example, there are codes representing analog 2-wire ground start and loop start, digital loops with bandwidth specification and the like.

[9] Also, this information may be presented differently in different geographic areas depending upon switch type or other central office variations. CLECs need an understanding of these differences in order to be able to evaluate this proposed functional change.

that provide NC/NCI data are consistent with database queries and other pre-ordering functions that, in turn, are aligned with industry standards. In the case of Ameritech, however, this is not the case, and without basic information on the ways in which these queries and responses will be handled, CLECs lack any basis on which to begin to engage in a collaborative.

B. Ordering

The treatment of the ordering function in the POR is, if anything, even more glaringly uninformative. As the Present Methods of Operation discussion reveals Ameritech lags behind with respect to the LSOG and TCIF standards for ordering. For more than two years, Ameritech's systems have remained static while updates to industry standards have been published by ATIS/TCIF. During that period CLECs have been working with other RBOCs to migrate toward the standards as they evolve, recognizing that incremental changes toward full compliance with the standards is preferable to huge "leaps" that skip over entire versions or generations of the standards. Ameritech's current ordering interface is a pre-LSOG 2 version[10] and thus it lags a full two versions behind the current industry standards (and behind the versions used in the other SBC territories, see POR pp. 12-13).

In these circumstances the salient question for Ameritech is "What version of industry standards for ordering is to be implemented by April of 2000 and in what manner is it to be implemented (e.g., to what extent is it consistent with the standards)?" The POR, astonishingly, does not provide the answers. There is no mention of plans to

[10] SBC/Ameritech list the Ameritech ordering interface as LSOG 2, but that is not consistent with technical representations made by Ameritech to AT&T as recently as January 19, 2000 and AT&T's experience, which is that it in fact is on an incomplete version of LSOG 2.

implement LSOG 3, or LSOG 4, and in fact there is no discussion of any effort to move toward compliance with standards *at any level*. This failure is inconsistent with the very notion of a Plan of Record for OSS improvements, and it is inconsistent with SBC/Ameritech's commitment to "deploy. . .commercially ready, application-to-application interfaces, *as defined adopted, and periodically updated by industry standard-setting bodies for OSS. . . .*" Merger Condition 29 (emphasis supplied).[11]

Again, this information is fundamental to and should be a part of any OSS Plan of Record. Moreover, this is not a question of a few missing "details" that could be supplied in the collaborative process. It would be unfair to CLECs, working under an extremely compressed schedule, to take up limited collaborative time garnering such basic information about SBC/Ameritech's plans. Moreover, it would not be in accord with the procedural framework which SBC/Ameritech proposed and the Commission adopted, as

[11] Similarly, Ameritech states that it intends to build a Graphical User Interface (GUI) to support (primarily) smaller CLECs in ordering products and services from Ameritech. But, as with the application-to-application interface, Ameritech fails to specify the version of standards to which this interface will conform or the extent to which it will conform. Moreover, according to SBC/Ameritech's Illinois timeline, the release announcement for the ordering as well as pre-ordering GUI is not until *December 2000*. Again, there is not much that can be said in the upcoming collaborative about a GUI interface that is yet to be described in any meaningful way.

discussed above. In structuring this process as it has, the Commission's evident intent was for the collaborative to be an examination of plans set forth, comprehensively, in the POR, including discussion of the considerations that went into those plans and exploration of options and alternatives to determine if better solutions are available. It is for SBC/Ameritech in the first instance to lay out their plans for interface improvements such that CLECs can reasonably evaluate and critique them and suggest needed improvements. It has not done so. The POR omits vital elements, and thus it fails to provide the basis for a collaborative discussion. These shortcomings are not subtle, and SBC/Ameritech should be required to curve the omissions to the plan before proceeding.[12]

C. Billing

The billing discussion of the POR is also so vague and equivocal that it fails to convey the essentials of SBC/Ameritech's plans. The POR acknowledges that "[t]here

[12] It is disturbing that SBC/Ameritech has fallen so short in this, virtually its first act of "compliance" with the merger conditions, and particularly disturbing in that all that was really required was not action or performance on SBC/Ameritech's part but merely for it to disclose its *plans*.

are some deviations from current industry standards" in Ameritech's CLEC billing (POR, p. 32). With respect to the Exchange Message Interface (EMI), for example, the POR states that "deviations in the implementation in Ameritech Illinois exist." SBC/Ameritech state that they will "align the *essential elements* of these CLEC billing attributes consistent with industry guidelines and direction" and that "[a]pproved OBF guildelines *as appropriate* will continue to be implemented by Ameritech Illinois." Id. The Plan is short on specifics, however, and the qualifying language (e.g., "essential," "as appropriate") leave SBC/Ameritech practically complete latitude to decide, in the future, what it is willing and unwilling to do in achieving compliance with the industry standards. No CLEC has the ability to plan changes to the ways in which it receives and processes Ameritech billing data when Ameritech reserves the ability to decide which standards it will meet, what deviations will remain and when they will be remedied, if at all. CLECs have complained to Ameritech for some time that its UNE billing hinders

CLECs from using Ameritech billing media effectively and efficiently;[13] the POR fails even to address the issue

D. System Integration

Merger Condition 29 provides that the Plan of Record shall include the companies' plan for "integrating their OSS processes." The POR in the "Present Methods of Operation" section describes in some detail differences in functionality that currently exist among the SBC regional entities. Nowhere, however, does the plan describe or even discuss plans to provide CLECs with interfaces that are integrated across SBC's regions. Consistent with Condition 29, the Plan should describe how the OSS interfaces will be made uniform, how and when the integration will take place, and whether any of the interfaces will gain or lose characteristics or functions as a result of integration. Absent this information, CLECs are seriously hampered in their ability to assess the changes that have been disclosed and to collaborate on those changes in Phase 2.

[13] The billing that Ameritech provides today is not computer-processable, and it is inconsistent with well established industry standards. ATIS has issued the Carrier Access Billing System Billing Output Standard (CABS BOS) Version 32. Ameritech has implemented CABS BOS Version 32. Currently, AT&T receives bills from Ameritech formatted in CABS, AEBS, or the "Customer Records Information System" or CRIS, and in each case through a mix of electronic and paper copies.

II. The Plan Of Record Fails to Address Essential Business Processes Relating to OSS

The SBC/Ameritech POR also rests on an overly narrow view of subject areas that need to be addressed.[14] It is confined essentially to the actual OSS interfaces themselves, and largely disregards associated business processes and rules that in many instances govern the ways in which ILEC and CLECs interact in connection with the OSS functions and interfaces. This narrow focus is inconsistent with SBC/Ameritech's OSS commitment: As noted above, the Plan of Record in SBC/Ameritech's own words was to "consist of an overall assessment of SBC's and Ameritech's existing OSS *interfaces, business processes and rules, . . .*and the companies' plan for developing and deploying application-to-application interfaces and graphical user interfaces for OSS, *as well as integrating their OSS processes*." Merger Condition 29. The FCC in its recent UNE Remand Order[15] has reiterated that Operations Support Systems is defined to

[14] The Plan mentions xDSL, for example, (e.g., POR at 26), but does not include that information in this document, apparently because of the separate on-going POR/collaborative effort on that topic. AT&T recognizes that xDSL is explicitly the subject of the FCC's merger condition, but certainly xDSL should be incorporated into a comprehensive Illinois OSS Plan.

[15] *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996,* CC Docket No. 96-98, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, September 15, 1999 (the "UNE Remand Order").

include "the manual, computerized and automated systems, *together with associated business processes*. . . ."[16]

The approach taken in the POR is at odds with this definition. Examples of areas in which SBC/Ameritech have excluded operations methods and procedures that have direct and consequential bearing on OSS operations are set forth below.

Loop "hot cut" processes.[17] The provision of loops via hot-cut is governed by business rules that are established by each of the SBC regional entities. The procedures that enable Pacific Bell, for example, to provide California CLECs with coordinated hot-cuts and efficient loop transitions to CLEC switches are known throughout the industry. The Ameritech hot-cut loop process is known to be far less efficient, far more prone to creating lapses in end user service and seen as a competitive barrier to providing service to end users, efficiently and reliably, from CLEC switches. The Plan does not address these processes and makes no provision for incorporating processes of other SBC entities into Illinois, thus improving OSS performance.

[16] UNE Remand Order, ¶425.

[17] "Hot cut" is industry terminology for the cooperative efforts on the part of ILEC and CLEC to move the termination of a subscriber's line to another service provider's switch. In a hot cut process, as distinguished from a loop migration, the customer does not lose service.

Electronic order "flow-through." Another example of business rules that come into play in connection with OSS interfaces are those that impact the rate of service order flow-through. A CLEC order that "flows-through" the Ameritech system is one that is processed electronically in the OSS interface and in the Ameritech legacy systems (i.e., service order processor, billing system, customer records database) – all without manual intervention on the Ameritech side of the interface. Ameritech's SBC affiliates report flow through rates that indicate a lower incidence of manual intervention relative to Ameritech. Manual intervention increases the likelihood that errors and delay will be introduced into order processing. The Plan does not mention this issue or address improvements that Ameritech intends to make, or that it even considers to be candidates for collaboration, in the area of order flow-through. The Plan of Record should include Ameritech's view of the improvements it will take to incorporate revised operations procedures to enhance CLEC order flow-through rates.

CLEC Access to Testing of Changes to Ameritech OSS Interfaces. Many of the changes that Ameritech has announced within as well as outside of its Plan of Record will require complementary development work by CLECs of their systems and interfaces. These are complex systems in their own right, and an additional layer of complexity is introduced as they are interfaced with Ameritech's systems. Consequently, CLECs have an ongoing need for access to an Ameritech testing facility to evaluate the working of their OSS interfaces with Ameritech's, and whether changes made to Ameritech's systems introduce failures in the passing of orders, particularly via the application-to-application electronic interfaces. Indeed, because CLEC development intervals will not necessarily match Ameritech's, multiple testing and production environments must be

made available as Ameritech migrates its production systems from one version of industry standards to another. Otherwise, CLECs risk service outages or the needless stranding of investment. The Plan of Record is entirely silent on these issues.

Ameritech Support Services For System Changes. The POR indicates Ameritech's intention to add interfaces (e.g., a Web-GUI for pre-ordering and another for ordering) that will make new features and functions available, and as discussed above it indicates in general terms an intent to migrate its application-to-application interfaces to more current industry standards. Such changes impact CLEC operations that are supported today by Ameritech Information Industries Service Centers or the Ameritech Resource Center. The POR is silent on the manner in which Ameritech will support CLECs during the course of such OSS changes, and it makes no provision for any additional support services in connection with them. The Plan is thus incomplete, in that CLECs cannot address the adequacy of planned changes without a description of the associated mechanisms supporting the changes.

Publication of Specifications and Documentation. The changes and additions that Ameritech makes in its OSS interfaces will need to be documented comprehensively and accurately across the various modes of publication used by CLECs in connection with the interfaces. The specifications and other information needed by CLECs must be adequate and readily accessible. Ameritech must publish the documentation and specifications in ways that make them accessible to CLECs. Ameritech has employed various methods in the past several years; for example, it now uses its Electronic Service Ordering guide. In other of the SBC regions, however, the methods of publication differ from Ameritech's. Southwestern Bell, for example, uses its Local Service Order

Requirements. There are updating protocols that the various SBC entities use that offer CLECs different ways to access the information, and there are different types of specification documents that some of the SBC entities (other than Ameritech) make available to better enable CLECs to build interfaces to SBC's systems. Ameritech makes no information available in the Plan that indicates whether it intends to improve its current methods or not, whether it intends to implement one specific SBC entity's publication methodology, or whether it has any specific plans. The means that SBC elects to use for publishing specifications and documentation has significant ramifications for the CLEC industry, however, and the Plan of Record should address this topic.

Performance Measurement Changes. The Commission's Merger Order addresses performance measurement and a collaborative process is currently underway on that topic. The Plan of Record for OSS is not complete, however, unless it provides a linkage or mechanism by which *changes* to OSS are tied to *changes* or adjustments to performance measurements. The commitment to make improvements to OSS is meaningless unless those improvements are actually delivered to the marketplace, and that implies a system of measurements that demonstrates those improvements. The OSS Plan is silent on performance measurement, and thus it treats the two topics as separate and isolated.

Change Management. SBC has been working with CLECs over the past few months on its Change Management Process. It has solicited CLEC input on issues such as notification intervals and methods as well as other parameters governing the ways in which changes are announced and communicated to CLECs. CLECs are pursuing other modifications to the Change Management Process that Ameritech would make in its

systems to respond to industry needs. In particular, CLECs have attempted to improve the scope of the Change Management Process to include business issues and other operations matters that directly impact the CLEC interfaces with Ameritech.

The Plan of Record does not address the overall change management topic. It does not even indicate whether SBC intends to institute a common Change Management Process or whether it intends to maintain a separate process for Illinois. It fails to identify the scope and coverage of a change management process as it relates to OSS (i.e., is it limited to the interfaces themselves, or does it – as it should – extend to the associated business and operational changes). And most immediately, it fails to address the manner in which the additions and changes that are contemplated within the Plan itself (to the extent they are described) will be managed *vis-a-vis* CLECs. It is unacceptable that the Plan of Record, which is the first step in meeting the OSS commitment, ignores this vital topic. Orderly and effective change processes are integral to any "comprehensive plan for improving the OSS systems and interfaces available to CLECs in Illinois," and change management issues should be addressed specifically in the OSS context.

Conclusion

AT&T in these Comments has not attempted to provide a comprehensive list of shortcomings or issues with respect to the plans that *are* set forth in the POR. That is properly done in the Phase 2 collaborative. Rather, at this point we have enumerated significant omissions and gaps in the plan that must be supplied by SBC/Ameritech before proceeding to the next stage. Other parties likely will identify additional items, and we would hope that Staff will collect and catalogue the significant areas of omission

comprehensively for the Commission in its report and recommendation. As discussed above, the Merger Condition on OSS sets out a coherent and logical progression from Plan of Record, to collaborative process, to implementation and testing, each stage of which builds upon the previous work. It is thus vital to get the POR "right," at least in the sense of its being complete and adequately informative, before proceeding to the Phase 2 collaborative.

Accordingly, the Commission should reject this POR and send it back for additional work, as discussed above.

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Respectfully submitted,

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